



AUSTRALIAN
AIRPORTS
ASSOCIATION

4 April 2024

Australian Communications and Media Authority
Level 32 Melbourne Central Tower
360 Elizabeth Street
MELBOURNE VIC 3000

To whom it may concern,

The Australian Airports Association (**AAA**) is lodging this submission in response to the Australian Communications and Media Authority (**ACMA**) consultation on its draft Five-Year Spectrum Outlook and annual work program (**Work Program**), issued on 7 March 2025.

Specifically, the AAA urges the ACMA to include a review of the current body scanner licensing arrangements to accommodate the operation of body scanners in the 20-40 GHz frequency range in its 2025-26 Work Program.

The AAA made the same request in 2023 and 2024, along with several other stakeholders.

AAA requests that the ACMA revisits its preliminary view in its draft 2025-30 FYSO to postpone any review into the class licensing arrangements for body scanners indefinitely.

This approach appears to contradict indications given by the ACMA in 2024 and creates uncertainty for the industry. Body scanners play a critical role in aviation security, and the AAA has concerns that further delay in the adoption of newer and better technologies could have adverse security, efficiency and customer experience outcomes.

About the AAA

The Australian Airports Association (AAA) serves as the national voice for over 340 airports and aerodromes across Australia, ranging from major international gateways to regional and remote airstrips. In addition, the AAA represents more than 150 corporate members supplying products and services to airports and the broader aviation industry.

As Australia's leading voice for airports and aviation stakeholders, the AAA is committed to driving industry excellence and innovation.

The AAA represents the interests of airports and aerodromes Australia wide, including all Designated, Tier 1 and Tier 2 security-controlled airports where security screening equipment is in use.

Why is this issue important for the aviation sector?

Body scanners are an integral part of aviation security and are the front-line in detection of traditional and emerging threats.

However, high false alarm rates and the limited ability of current technologies to reliably detect smaller metallic and non-metallic threat objects are major pain points across the aviation sector.

High false alarm rates on existing body scanner technologies hold up security screening processes and result in longer wait times for passengers.

In addition, the body scanners currently deployed in Australian airports do not necessarily offer the same degree of privacy or gender neutrality to passengers as some newer technologies. The AAA is concerned to reduce the incidences of inefficient, and sometimes stressful, secondary inspections.

Newer technologies have demonstrated superior performance in reducing false alarms whilst maintaining existing detection standards. Such technologies also have capacity with higher resolution to evolve with the threat detection landscape providing a platform to manage changes in the security environment.

There are also important benefits for passenger facilitation with an improved passenger experience which is vital to our members to reduce the friction in the book to board process.

Body scanners currently operate in security screening areas at Australian airports pursuant to an ACMA class licence which permits use of the 24.25-30 GHz and 67-80 GHz frequency ranges.

However, the AAA understands that the newer body scanning technology which are in the process of being deployed in other jurisdictions and which operate in a broader GHz frequency range.

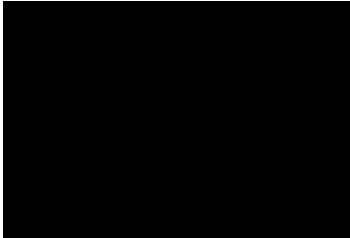
While this technology is not accommodated within the current licensing framework, it has a range of benefits including materially lower false alarm rates, improved privacy and significantly improved resolution and detection of threats that would substantially address some key challenges that the aviation industry is currently facing.

The AAA therefore urges the ACMA to consider reviewing the current body scanner class licence as part of its 2025-26 Work Program.

Given the anticipated lead time between consideration of the issue in the Work Program and the formalisation of any resulting licensing changes, the AAA views this issue is urgent.

If you have any questions about this submission please contact myself on [REDACTED] or via email – [REDACTED]

Yours sincerely,



Simon Westaway

Chief Executive